Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of	)	
	)	
Revision of the Commission's Rules to Ensure Compatibility with Enhanced 9-1-1 Emergency Calling Systems	)	**CC Docket No. 94-102**

DOCKET FILE COPY ORIGINAL

To: The Commission

COMMENTS OF OREGON STATE POLICE EMERGENCY MANAGEMENT DIVISION

OREGON STATE POLICE, EMERGENCY MANAGEMENT DIVISION hereby submits the following comments in response to the Commission's Notice of Proposed Rulemaking, FCC 94-237 (released October 19, 1994), in the above-captioned proceeding.

The Emergency Management Division of the Oregon State Police is the agency responsible for administering Oregon's legislative mandate to implement Enhanced 9-1-1 telephone service statewide by January 1, 2000.

On January 1, 1991, the State of Oregon became the sixth State in the United States to provide statewide 9-1-1 telephone service. This was accomplished through legislation enacted in 1981 which included the adoption of a telephone tax which raised approximately $61,000,000 between January 1982 and the end of June 1990.

Oregon's commitment to 9-1-1 is such that during the 1991 legislative session, we upgraded our mandate to require Enhanced 9-1-1 telephone service statewide by January 1, 2000. An increase in the telephone tax was authorized which

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generates an additional $5,200,000 a year dedicated to Enhanced 9-1-1 telephone system expense. As of this date, 47% or approximately 1.4 million Oregonians are served with Enhanced 9-1-1.

Communities throughout the United States have adopted Enhanced 9-1-1 as their preferred means of acquiring police, fire and medical assistance in an emergency. Included as "Exhibit A" is a list of U.S. Cities over 100,000 population ranked according to the 1990 census which shows that out of 195 cities, only four are not yet providing Enhanced 9-1-1 (ANI & ALI).

As the nationwide safety net of Enhanced 9-1-1 systems expand, we can no longer afford to ignore the growing number of holes in the net (ie: PBX, Cellular, PCS/PCN, Centrex, etc.) caused by a lack of nationally recognized requirements and/or standards aimed at creating compatibility for accessing Enhanced 9-1-1.

The State of Oregon supports and applauds the Commission in its attempt to address this issue. We also wish to recognize the efforts of three National Associations in their response to this proceeding. They are the Associated Public Safety Communications Officers (APCO) International, the National Emergency Number Association (NENA) and the National Association of State 9-1-1 Administrators (NASNA).

Oregon's specific comments are as follows:

1.0 COMPATIBILITY OF PBX EQUIPMENT WITH 9-1-1 SYSTEMS

1.1 Recognize:

2.2.49 Private Branch Exchange (PBX), n. - a private, internally switched

telephone system, of significance to 9-1-1 systems because internal stations may not be individually contained in the DMS and, as a result, will not be displayed by ANI or ALI equipment. [1]

With the adoption of the proposed rules the technological considerations of enhanced 9-1-1 compatibility should be met. Decisions concerning the application of the technology, i.e. requirements for enabling this technology, is best left to state and local government.

9-1-1 Availability

1.2 We believe that 9-1-1 should be accessible without having to dial extra digits from any phone capable of being connected to the PSTN. We further support the labeling of equipment not capable of meeting the proposed rules.

Attendant Notification

1.3 We agree that 9-1-1 access through a PBX should be capable of providing attendant notification to assist in the delivery of emergency services to a 9-1-1 call. Review of proposed change to Commission Rule 68.320(e) resulted in no recognized conflict with Oregon Law or Administrative Rules.

ALI Database Maintenance

1.4 The State of Oregon believes that database maintenance is central to the efficient and effective delivery of Enhanced 9-1-1 services. Oregon currently addresses database maintenance through administrative rule. We envision no difficulty in extending these rules to apply to PBX ALI.

Station Number Identification (SNI)

1.5 We support Station Number Identification (SNI) and agree that it is a state

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[1] American Standards and Testing Materials (ASTM) Document F30.04.03 1991.

and local government issue.

Information Protocol Standard

1.6 We support the current use of the CAMA interface as the industry standard for today. As other interfaces such as SS7 and ISDN become available, state and local governments will need to maintain compatibility with these interfaces. We also support the NENA data standards as being the standardized format for data exchange.

Local Exchange Company Services

1.7 We support rapid implementation of features capable of providing PS-ALI for PBX equipment. We agree that all providers of telecommunications dial tone and/or equivalent should provide access to 9-1-1 to comply with the proceedings. Provisions of the services should be a state and local issue.

Implementation Schedule

1.8 We support the implementation schedule and labeling requirements proposed by the Commission.

2.0 COMPATIBILITY OF WIRELESS SERVICES WITH ENHANCED 9-1-1

2.1 We feel that wireless services need to be compatible with Enhanced 9-1-1 capabilities. We support a nationwide standard for Enhanced 9-1-1 services in the wireless community. We feel the development of the standard needs to be a joint effort between industry and the public safety community.

9-1-1 Availability

2.2 Mobile radio handset users should have the ability to reach 9-1-1 in their home service area or a subscribed to roamed service area by only dialing 9-1-1.

Grade of Service

2.3 We support the establishment of a "grade of service" for access to emergency services on the wireless network. We feel that this issue will require a cooperative effort between initiating interconnecting and terminating systems in the wireless environment.

9-1-1 Call Priority

2.4 We support 9-1-1 call priority on mobile radio network.

User Location Information

2.5 We support the use of ALI with the mobile radio network and feel that latitude, longitude and altitude will be able to provide the most precise location of the caller. We also agree that standards organizations will need to be involved in developing standards for the technology.

Re-Ring/Call Back

2.6 We need the ability to call the caller back and support technology that would accomplish this.

Common Channel Signaling

2.7 We support the use of the SS7 signalling standards for 9-1-1 calling on the mobile radio network.

Access to Text Telephone Devices (TTY)

2.8 We support the one year time frame making mobile radio services capable of access to text telephone devices and 9-1-1.

Equipment Manufacture, Importation, and Labeling

2.9 We agree with the position that equipment that cannot meet the ANI and ALI standards for 9-1-1 should be labeled as being non-compliant.

3.0 ADDITIONAL CONSIDERATIONS

Privacy

3.1 We support the position that privacy on the mobile radio networks should

be a state and local issue for calls made to 9-1-1.

Compatibility with Network Services

3.2 We feel that there is a strong public perception and expectation that 9-1-1 will help the public in a very short time period. 9-1-1 should be available with the same basic features on both the wire-line network and the wireless network. All states should be encouraged by the Commission to move forward in providing statewide coverage for 9-1-1 in their states.

Preemption

3.3 We understand the Commissions need to pursue preemption in the interest of attaining nationwide compatibility concerning Enhanced 9-1-1. As currently proposed, Oregon could support preemption on the premise that no conflict exists between proposed Commission rules and those already existing in Oregon. However, should the proposed rules be changed, we reserve the right to withdraw our support for preemption.

CONCLUSION

9-1-1 is a relatively new public safety service having been only introduced in 1968. As new technology and deregulation take hold in our society, public access to Enhanced 9-1-1 has begun to erode. The public can no longer be assured that they will get the same level of service from one community to the next depending on the technology used to access 9-1-1.

In March of 1973, the Executive Office of the President, Office of Telecommunications Policy issued Bulletin Number 73-1, a complete copy of which has been included as "Exhibit B". Commission review of this document will serve to establish that from the beginning, Federal participation in promoting 9-1-1 was limited to encouraging local authorities to adopt and establish the

service. That was 22 years ago, and much has happened since then.

A large percentage of the population is now covered, we are experiencing the technology boom and Rescue 9-1-1 airs nightly on televisions throughout the country viewed by millions of children and their families. 9-1-1 has become a household word.

In order to protect the integrity of our Enhanced 9-1-1 systems nationwide, a national focus, on the problems enumerated earlier, must be attained.

For the reasons stated above, Oregon State Police, Emergency Management Division requests that the Commission take a strong stand and adopt a leadership role by proceeding to adopt rules necessary to ensure compatibility with Enhanced 9-1-1 systems .

Respectfully Submitted,

Oregon State Police
Emergency Management Division

By: 

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January 5, 1995

EXHIBIT A

Oregon

DEPARTMENT OF
STATE POLICE

OREGON EMERGENCY MANAGEMENT

9-1-1 STATUS

U.S. CITIES OVER 100,000 POPULATION

(RANKED ACCORDING TO 1990 CENSUS)

AS OF AUGUST, 1994

RANK	CITY	POPULATION	9-1-1 SERVICE
1.	New York, NY	7,322,564	Basic*
2.	Los Angeles, CA	3,485,398	Enhanced
3.	Chicago, IL	2,783,726	Enhanced
4.	Houston, TX	1,630,553	Enhanced
5.	Philadelphia, PA	1,585,577	Enhanced
6.	San Diego, CA	1,110,549	Enhanced
7.	Detroit, MI	1,027,974	Enhanced
8.	Dallas, TX	1,006,877	Enhanced
9.	Phoenix, AZ	983,403	Enhanced
10.	San Antonio, TX	935,933	Enhanced
11.	San Jose, CA	782,248	Enhanced
12.	Indianapolis, IN	741,952	Enhanced
13.	Baltimore, MD	736,014	Enhanced
14.	San Francisco, CA	723,959	Enhanced
15.	Jacksonville, FL	672,971	Enhanced
16.	Columbus, OH	632,910	Enhanced
17.	Milwaukee, WI	628,088	Enhanced
18.	Memphis, TN	610,337	Enhanced
19.	Washington, DC	606,900	Enhanced
20.	Boston, MA	574,283	Basic*
21.	Seattle, WA	516,259	Enhanced
22.	El Paso, TX	515,342	Enhanced
23.	Nashville-Davidson, TN	510,784	Enhanced
24.	Cleveland, OH	505,616	Enhanced
25.	New Orleans, LA	496,938	Enhanced
26.	Denver, CO	467,610	Enhanced
27.	Austin, TX	465,622	Enhanced
28.	Fort Worth, TX	447,619	Enhanced
29.	Oklahoma City, OK	444,719	Enhanced

*Denotes in the E9-1-1 Planning Stages

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SECTIONS:
Financial Services
Technology and Operations
Plans and Training

30.	Portland, OR	437,319	Enhanced
31.	Kansas City, MO	435,146	Enhanced
32.	Long Beach, CA	429,433	Enhanced
33.	Tucson, AZ	405,390	Enhanced
34.	St. Louis, MO	396,685	Enhanced
35.	Charlotte, NC	395,934	Enhanced
36.	Atlanta, GA	394,017	Enhanced
37.	Virginia Beach, VA	393,069	Enhanced
38.	Albuquerque, NM	384,736	Enhanced
39.	Oakland, CA	372,242	Enhanced
40.	Pittsburgh, PA	369,879	Enhanced
41.	Sacramento, CA	369,365	Enhanced
42.	Minneapolis, MN	368,383	Enhanced
43.	Tulsa, OK	367,302	Enhanced
44.	Honolulu, HI	365,272	Enhanced
45.	Cincinnati, OH	364,040	Enhanced
46.	Miami, FL	358,548	Enhanced
47.	Fresno, CA	354,202	Enhanced
48.	Omaha, NE	335,795	Enhanced
49.	Toledo, OH	332,943	Enhanced
50.	Buffalo, NY	328,123	Enhanced
51.	Wichita, KS	304,011	Enhanced
52.	Santa Ana, CA	293,742	Enhanced
53.	Mesa, AZ	288,091	Enhanced
54.	Colorado Springs, CO	281,140	Enhanced
55.	Tampa, FL	280,015	Enhanced
56.	Newark, NJ	275,221	Enhanced
57.	St. Paul, MN	272,235	Enhanced
58.	Louisville, KY	269,063	Enhanced
59.	Anaheim, CA	266,406	Enhanced
60.	Birmingham, AL	265,968	Enhanced
61.	Arlington, TX	261,721	Enhanced
62.	Norfolk, VA	261,229	Enhanced
63.	Las Vegas, NV	258,295	Enhanced
64.	Corpus Christi, TX	257,453	Enhanced
65.	St. Petersburg, FL	238,629	Enhanced
66.	Rochester, NY	231,636	Enhanced
67.	Jersey City, NJ	228,537	Enhanced
68.	Riverside, CA	226,505	Enhanced
69.	Anchorage, AK	226,338	Enhanced
70.	Lexington-Fayette, KY	225,366	Enhanced
71.	Akron, OH	223,019	Enhanced
72.	Aurora, CO	222,103	Enhanced
73.	Baton Rouge, LA	219,531	Enhanced

74.	Stockton, CA	210,943	Enhanced
75.	Raleigh, NC	207,951	Enhanced
76.	Richmond, VA	203,056	Enhanced
77.	Shreveport, LA	198,525	Enhanced
78.	Jackson, MS	196,637	Enhanced
79.	Mobile, AL	196,278	Enhanced
80.	Des Moines, IA	193,187	Enhanced
81.	Lincoln, NE	191,972	Enhanced
82.	Madison, WI	191,262	Enhanced
83.	Grand Rapids, MI	189,126	Enhanced
84.	Yonkers, NY	188,082	Enhanced
85.	Hialeah, FL	188,004	Enhanced
86.	Montgomery, AL	187,106	Enhanced
87.	Lubbock, TX	186,206	Enhanced
88.	Greensboro, NC	183,521	Enhanced
89.	Dayton, OH	182,044	Enhanced
90.	Huntington Beach, CA	181,519	Enhanced
91.	Garland, TX	180,650	Enhanced
92.	Glendale, CA	180,038	Enhanced
93.	Columbus, GA	179,278	Enhanced
94.	Spokane, WA	177,196	Enhanced
95.	Tacoma, WA	176,664	Enhanced
96.	Little Rock, AR	175,795	Enhanced
97.	Bakersfield, CA	174,820	Enhanced
98.	Fremont, CA	173,339	Enhanced
99.	Fort Wayne, IN	173,072	Enhanced
100.	Newport News, VA	170,045	Enhanced
101.	Worcester, MA	169,759	Enhanced
102.	Knoxville, TN	165,121	Enhanced
103.	Modesto, CA	164,730	Enhanced
104.	Orlando, FL	164,693	Enhanced
105.	San Bernardino, CA	164,164	Enhanced
106.	Syracuse, NY	163,860	Enhanced
107.	Providence, RI	160,728	Enhanced
108.	Salt Lake City, UT	159,936	Enhanced
109.	Huntsville, AL	159,789	Enhanced
110.	Amarillo, TX	157,615	Enhanced
111.	Springfield, MA	156,983	Enhanced
112.	Irving, TX	155,037	Enhanced
113.	Chattanooga, TN	152,466	Enhanced
114.	Chesapeake, VA	151,976	Enhanced
115.	Kansas City, KS	149,767	Enhanced
116.	Ft. Lauderdale, FL	149,377	Enhanced
117.	Glendale, AR	148,134	Enhanced

118.	Warren, MI	144,864	Enhanced
119.	Winston-Salem, NC	143,485	Enhanced
120.	Garden Grove, CA	143,050	Enhanced
121.	Oxnard, CA	142,216	Enhanced
122.	Tempe, AZ	141,865	Enhanced
123.	Bridgeport, CT	141,686	Enhanced
124.	Patterson, NJ	140,891	Basic-ANI
125.	Flint, MI	140,761	Enhanced
126.	Springfield, MO	140,494	Enhanced
127.	Hartford, CT	139,739	Enhanced
128.	Rockford, IL	139,426	Enhanced
129.	Savannah, GA	137,560	Enhanced
130.	Durham, NC	136,611	Enhanced
131.	Chula Vista, CA	135,163	Enhanced
132.	Reno, NV	133,850	Enhanced
133.	Hampton, Va	133,793	Enhanced
134.	Ontario, CA	133,179	Enhanced
135.	Torrance, CA	133,107	Enhanced
136.	Pomona, CA	131,723	Enhanced
137.	Pasadena, CA	131,591	Enhanced
138.	New have, CT	130,474	Enhanced
139.	Scottsdale, AZ	130,069	Enhanced
140.	Plano, TX	128,713	Enhanced
141.	Oceanside, CA	128,398	Enhanced
142.	Lansing, MI	127,321	Enhanced
143.	Lakewood, CO	126,481	Enhanced
144.	Evansville, IN	126,272	Enhanced
145.	Boise, ID	125,738	Enhanced
146.	Tallahassee, FL	124,773	Enhanced
147.	Laredo, TX	122,899	Enhanced
148.	Hollywood, FL	121,697	Enhanced
149.	Topeka, KS	119,883	Enhanced
150.	Pasadena, TX	119,363	Enhanced
151.	Moreno Valley, CA	118,779	Enhanced
152.	Sterling Heights, MI	117,810	Enhanced
153.	Sunnyvale, CA	117,229	Enhanced
154.	Gary, IN	116,646	Enhanced
155.	Beaumont, TX	114,323	Enhanced
156.	Fullerton, CA	114,144	Enhanced
157.	Peoria, IL	113,504	Enhanced
158.	Santa Rosa, CA	113,313	Enhanced
159.	Eugene, OR	112,669	Basic*
160.	Independence, MO	112,301	Enhanced
161.	Overland Park, KS	111,790	Enhanced

162.	Hayward, CA	111,498	Enhanced
163.	Concord, CA	111,348	Enhanced
164.	Alexandria, VA	111,183	Enhanced
165.	Orange, CA	110,658	Enhanced
166.	Santa Clarita, CA	110,642	Enhanced
167.	Irvine, CA	110,330	Enhanced
168.	Elizabeth, NJ	110,002	Enhanced
169.	Inglewood, CA	109,602	Enhanced
170.	Ann Arbor, MI	109,592	Enhanced
171.	Vallejo, CA	109,199	Enhanced
172.	Waterbury, CT	108,961	Enhanced
173.	Salinas, CA	108,777	Enhanced
174.	Cedar Rapids, IA	108,751	Enhanced
175.	Erie, PA	108,718	Enhanced
176.	Escondido, CA	108,635	Enhanced
177.	Stamford, CT	108,056	Enhanced
178.	Salem, OR	107,786	Enhanced
179.	Abilene, TX	106,654	Enhanced
180.	Macon, GA	106,612	Enhanced
181.	El Monte, CA	106,209	Enhanced
182.	South Bend, IN	105,511	Enhanced
183.	Springfield, IL	105,227	Enhanced
184.	Allentown, PA	105,090	Enhanced
185.	Thousand Oaks, CA	104,352	Enhanced
186.	Portsmouth, VA	103,907	Enhanced
187.	Waco, TX	103,590	Enhanced
188.	Lowell, MA	103,439	Enhanced
189.	Berkeley, CA	102,724	Enhanced
190.	Mesquite, TX	101,484	Enhanced
191.	Rancho Cucamonga, CA	101,409	Enhanced
192.	Albany, NY	101,082	Enhanced
193.	Livonia, MI	100,850	Enhanced
194.	Sioux Falls, SD	100,814	Enhanced
195.	Simi Valley, CA	100,217	Enhanced

This list was compiled by Ken Keim of the Oregon 9-1-1 Program. If you know of any corrections or updates to this list, or have any questions, please call Ken Keim at (503) 378-2911 ext. 242.

EXHIBIT B

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF TELECOMMUNICATIONS POLICY
WASHINGTON, D.C. 20504

BULLETIN NO. 73-1

March 21, 1973

TO THE HEADS OF EXECUTIVE DEPARTMENTS AND ESTABLISHMENTS

SUBJECT: National Policy for Emergency Telephone Number "911"

1. PURPOSE. This Bulletin sets forth the policies that will be followed by executive departments and agencies with respect to the development and improving of emergency communications using the emergency telephone number 911. It provides information and guidance to assist state, local and municipal governments in implementing this emergency communications program expeditiously.

2. BACKGROUND. A clear need that all citizens be able rapidly to summon help in an emergency situation has long been recognized. A communications system which is immediately available and easy to use can help to meet this need. A person should be able to call for police, fire, rescue, and other emergency aid promptly and without confusion, and without regard to his familiarity with a particular community. A system which is uniform nationwide will enable a citizen to do this.

   For several years, numerous governmental commissions, legislative bodies, private organizations, and citizen groups have recommended the establishment of a single, nationwide emergency telephone number to meet this need for improved emergency communications. The 911 concept provides a single number which is easy to remember and to use. Moreover, the 911 system encourages those providing communications services and those providing emergency assistance to coordinate their efforts and facilities, and work together. The United States Independent Telephone Association and the Bell System have supported this concept, and have taken steps to implement it. Since 1968, over 200 communities with a combined population of 20 million have adopted and demonstrated the value of the 911 emergency telephone number concept.

   The lack of a clear focal point in the Federal Government, and the absence of an overall national policy in this area, however, has slowed implementation of the 911 concept in many other communities. This Bulletin is issued to clarify the Executive Branch's position supporting the 911 concept as the means to achieve a single nationwide emergency telephone number.

3. POLICIES AND PLANNING. These are important points which should be borne in mind by all cognizant agencies with respect to the implementation of 911 service nationwide:

   (a) It is the policy of the Federal Government to encourage local authorities to adopt and establish 911 emergency telephone service in all metropolitan areas, and throughout the United States. Whenever practicable, efforts should be initiated in both urban and rural areas at the same time.

   The primary purpose of 911 emergency telephone service should be to enable citizens to obtain law enforcement, medical, fire, rescue, and other emergency services as quickly and efficiently as possible by calling the same telephone number anywhere in the Nation. A secondary objective should be to enable public safety agencies to satisfy their operational and communications needs more efficiently.

(b) Responsibility for the establishment of 911 service should reside with local government. This is the level of government closest and most responsive to the beneficiaries of this service, and at which the need for most emergency service arises. At the local level the coordination of the responsibilities and functions of public safety agencies can best be accomplished, and consideration of special local needs undertaken most effectively. Since the areas served by telephone company central offices generally are not coincident with local political and jurisdictional boundaries, planning and implementation of 911 service should proceed through the cooperative efforts of all affected local agencies and jurisdictions.

The character of 911 service is essentially local and intrastate; Federal regulation or legislation in this area, accordingly, is not appropriate. States are encouraged to assist localities in their planning and implementing of 911 service.

(c) The cost for basic 911 telephone service arrangements should not be a deterrent to its establishment. The direct cost to local governments generally includes only the charge for local lines and terminal equipment needed to answer and refer 911 calls.

Planning and implementation of basic 911 service should not be deferred pending evaluation of proposed additions to basic 911 service. A number of 911 service enhancements (automatic call routing to particular jurisdictions and agencies, automatic number identification, etc.) have been proposed. These service enhancements should be considered with regard to their cost-effectiveness. Local authorities should, however, proceed to implement basic 911 service, to which enhancements can subsequently be made if desirable.

FEDERAL INFORMATION RESPONSIBILITY. A Federal Information Center on the emergency telephone number 911 will be established within the Office of Telecommunications in the Department of Commerce, Washington, D.C. 20230. The information to be available includes material on the techniques and methods of service and a comprehensive handbook on 911. Advice and assistance will be available through this center to local governments wishing to initiate 911 service in their communities. The center will also act as a clearinghouse for information concerning Federal assistance programs that may be available for the establishment of basic 911 service.

The availability of this Information Center on 911 service should be considered by Federal departments and agencies which have responsibilities in this or affected fields.

CLAY T. WHITEHEAD
Director